IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

IN RE: BARD IVC FILTERS
PRODUCTS LIABILITY LITIGATION

MDL No.: 2:15-md-02641-PHX-DGC

vs.

THIS DOCUMENT RELATES TO THE CASES LISTED ON THE EXHIBIT ATTACHED HERETO.

STIPULATION OF DISMISSAL WITH PREDJUDICE

COME NOW, Plaintiffs whose cases are listed on Exhibit A attached hereto ("Plaintiffs") and Defendants C.R. Bard, Inc. and Bard Peripheral Vascular, Inc. ("Defendants"), and file this Stipulation of Dismissal with Prejudice, and in support thereof, respectfully show the Court as follows:

Pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii), Plaintiffs and Defendants hereby stipulate to the dismissal of the cases listed on Exhibit A with prejudice to the re-filing of same. Plaintiffs and Defendants further stipulate that they are to bear their own costs.

WHEREFORE, PREMISES CONSIDERED, Plaintiffs and Defendants hereby respectfully request that the Court dismiss the cases listed on Exhibit A in their entirety with prejudice to the re-filing of same and order that these parties are to bear their own costs.

Respectfully submitted this 1st day of March, 2021.

Kevin Klein, Esq. kk drosenbaumnylaw.com Rosenbaum & Rosenbaum, P.C. 100 Wall Street, 15th Floor New York, NY 10005 P: 212-514-5007 F: 212-514-9178

Attorneys for Plaintiffs

Richard B. North, Jr.
richard.north@nelsonmullins.com
Nelson Mullins Riley &
Scarborough LLP
201 147th St. NW, Ste. 1700
Atlanta, GA 30363
P: 404-322-6000
F: 404-332-6397
Attorneys for defendants C.R. Bard, Inc.
And Bard Peripheral Vascular Inc.